

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair Newbern

**[PROPOSED] STIPULATED PRELIMINARY INJUNCTION**

Plaintiffs Concord Music Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music, Inc. (collectively, “Publishers”) and Defendant Anthropic PBC (“Anthropic”) hereby stipulate to the entry of this Stipulated Preliminary Injunction.

NOW THEREFORE upon consent of the parties hereto, IT IS HEREBY ORDERED:

1. On October 18, 2023, Publishers initiated this action by filing a Complaint against Anthropic, alleging claims for direct copyright infringement, contributory infringement, vicarious infringement, and removal or alteration of copyright management information, in violation of the Copyright Act (17 U.S.C. §§ 106(1)-(3), (5), 501, 1202). Dkt. 1.
2. In the Complaint, Publishers allege ownership and/or control, in whole or in part, of the exclusive rights to millions of valuable musical compositions, including the 500 compositions specifically identified in Exhibit A to the Complaint. *See* Dkt. 1-3.
3. On November 16, 2023, Publishers filed a Motion for Preliminary Injunction. Dkts. 40, 41.

4. On January 16, 2024, Anthropic filed an Opposition to that Motion. Dkt. 67.

5. Anthropic states that in response to Publishers' Motion for Preliminary Injunction, it implemented guardrails that prevent its current AI models from generating outputs that reproduce, distribute, or display lyrics to compositions owned or controlled by Publishers.

6. Publishers and Anthropic hereby stipulate to the following preliminary injunctive relief:

a. Anthropic will implement and maintain effective guardrails that prevent its current and future AI models from generating output that reproduces, distributes, or displays the lyrics, in whole or in part, to compositions owned or controlled by Publishers, including the compositions listed in Exhibit A to the Complaint, Dkt. 1-3.

b. Anthropic, and all officers, principals, agents, servants, employees, affiliates, licensees, transferees, purchasers, successors, and assigns, and all persons or entities acting on their behalf or in active concert or participation with any of them and who receive actual notice of this Preliminary Injunction, are enjoined and restrained from using copies of lyrics (or portions of lyrics) to compositions owned or controlled by Publishers for future training of Anthropic's AI models (unless expressly authorized to do so by Publishers via license or other written agreement). For purposes of this Preliminary Injunction, Anthropic will not be required to undo or reverse any training that has already taken place or extract any training data from its existing AI models or those already being trained; the prohibitions contained in this sub-paragraph apply only to future training.

7. In order to facilitate compliance with this Preliminary Injunction, Publishers will provide to Anthropic, within 21 days of the entry of this Order, an updated list of compositions owned or controlled by Publishers, in addition to the 500 compositions identified in Exhibit A to

the Complaint, Dkt. 1-3. Publishers will update that list of compositions on at least a quarterly basis, or as the parties otherwise agree. Anthropic will implement guardrails consistent with those identified in Paragraph 6(a) and sufficient to cover newly added compositions on any updated lists within \_\_\_\_ days of receipt of such updated lists from Publishers.

8. If Anthropic breaches any term of this Preliminary Injunction, Publishers will be entitled to such relief as the Court deems just.

9. Anthropic waives all rights to seek judicial review or otherwise challenge or contest the validity of this Preliminary Injunction.

STIPULATED AND AGREED BY:

DEFENDANT ANTHROPIC PBC

[Signature/Signatory Information]

Date: \_\_\_\_\_

PLAINTIFFS CONCORD MUSIC GROUP, INC., CAPITOL CMG, INC., UNIVERSAL MUSIC CORP., SONGS OF UNIVERSAL, INC., UNIVERSAL MUSIC – MGB NA LLC, POLYGRAM PUBLISHING, INC., UNIVERSAL MUSIC – Z TUNES LLC, AND ABKCO MUSIC, INC.

[Signature/Signatory Information]

Date: \_\_\_\_\_